

From: Azar, Jennifer (CAO)
To: "Rawls Williams, ESQ, RN"; "AJoseph2@rawsi.com"; "docservice@rawsi.com"
Cc: "trontz@dmtdlaw.com"; "allenf551@aol.com"; Llerandi, Jeanette (CAO)
Subject: RE: Ortega: 1) DEPO's of Ortega and Diaz; 2) MEDT: Select Date; 3) SERVICE OF COURT DOCUMENT: ORTEGA, Kenny v. MDC, et al. (24-cv-22523-KMM)
Date: Friday, June 27, 2025 10:19:29 AM

Ms. Williams, Good Morning.

I called your office once again this morning seeking to confer on the two outstanding discovery matters and I was advised that nobody is available to take my call.

We have been trying to set your client for deposition as far back as June 11, 2025, to no avail. Nor will I accept your offer to squeeze him in following your deposition of Officer Diaz in late September.

If I do not have confirmed deposition dates and amended disclosures from you by noon on Monday, June 30, I will proceed with scheduling the discovery hearing before Judge Elfenbein.

Thank you,

Jennifer L. Hochstadt Azar
Assistant County Attorney
Miami-Dade County Attorney's Office
111 NW 1st St., Suite 2810
Miami, Florida 33128
(305) 375-5151

From: Azar, Jennifer (CAO)
Sent: Thursday, June 26, 2025 9:52 AM
To: Rawls Williams, ESQ, RN <rawsi@rawsi.com>; AJoseph2@rawsi.com; docservice@rawsi.com
Cc: trontz@dmtdlaw.com; allenf551@aol.com; Llerandi, Jeanette (CAO) <Jeanette.Llerandi@miamidade.gov>
Subject: RE: Ortega: 1) DEPO's of Ortega and Diaz; 2) MEDT: Select Date; 3) SERVICE OF COURT DOCUMENT: ORTEGA, Kenny v. MDC, et al. (24-cv-22523-KMM)

Good Morning Ms. Williams,

I am following up to my e-mail below. I just called your office and left a message with your paralegal, Mr. Joseph.

Please call me back today to discuss the issues below. If you are not available, please advise whether this is something Mr. Allen can handle in your absence.

Thank you,

Jennifer L. Hochstadt Azar
Assistant County Attorney
Miami-Dade County Attorney's Office
111 NW 1st St., Suite 2810
Miami, Florida 33128
(305) 375-5151

From: Azar, Jennifer (CAO) <jennifer.azar@miamidade.gov>
Sent: Tuesday, June 24, 2025 1:36 PM
To: Rawls Williams, ESQ, RN <rawsi@rawsi.com>; AJoseph2@rawsi.com; docservice@rawsi.com; Llerandi, Jeanette (CAO) <Jeanette.Llerandi@miamidade.gov>
Cc: trontz@dmtdlaw.com
Subject: RE: Ortega: 1) DEPO's of Ortega and Diaz; 2) MEDT: Select Date; 3) SERVICE OF COURT DOCUMENT: ORTEGA, Kenny v. MDC, et al. (24-cv-22523-KMM)

Ms. Williams,

1. Please clarify whether Plaintiff-Ortega will appear in person for the 8/1/25 deposition, with Mr. Allen appearing virtually. If that is amenable

to you, then we'll notice the deposition to be held in person on 8/1/25, with accommodations for Mr. Allen, who works out of Orlando, to appear virtually.

2. Please advise of your availability for a telephonic meet and conferral as to the outstanding initial disclosure deficiencies. I am available for a phone call the remainder of **today**, tomorrow from 10AM—1PM, and anytime on Thursday. To the extent we cannot resolve the deposition date issue, then I request we confer on that as well. If we are unable to resolve these issues before the end of this week, I will need move forward with setting a hearing with Magistrate Judge Elfenbein whose Discovery Hearing Procedures specify strict enforcement with Local Rule 26.1(g)(2).

Thank you,

Jennifer L. Hochstadt Azar
Assistant County Attorney
Miami-Dade County Attorney's Office
111 NW 1st St., Suite 2810
Miami, Florida 33128
(305) 375-5151

From: Rawsi Williams, ESQ, RN <rawsi@rawsi.com>

Sent: Tuesday, June 24, 2025 10:09 AM

To: Ajoseph2@rawsi.com; docservice@rawsi.com; Llerandi, Jeanette (CAO) <jeanette.llerandi@miamidade.gov>

Cc: trontz@dmrtlaw.com; Azar, Jennifer (CAO) <jennifer.azar@miamidade.gov>

Subject: Re: Ortega: 1) DEPO's of Ortega and Diaz; 2) MEDT: Select Date; 3) SERVICE OF COURT DOCUMENT: ORTEGA, Kenny v. MDC, et al. (24-cv-22523-KMM)


EMAIL RECEIVED FROM EXTERNAL SOURCE

Good morning to All,

I hope all is well.

In response, we were closed for Juneteenth on 06/19/25, and have not yet been able to confirm the newly offered July dates with Mr. Ortega. We are in prayer that he's not in some type of emergency situation.

I'd already responded with alternative available dates for deposition of Mr. Ortega, but Ms. Azar did not select any of those dates. I'd offered the dates of September 10, 12, and 29, for depositions of Diaz and Mr. Ortega. I'd also responded that we are not available for your prior requested deposition dates of 08/06/25 - 08/09/25, and no we are not available for the day before of 08/05/25. I will be in a conference in another city that entire week as General Counsel for the organization hosting that conference, and you have required in-person depositions. Co-counsel Allen remains unavailable for that week to include 08/05/25.

In regard to your new requested dates below of July 29, 30, 31, and August 1, Co-Counsel Attorney Allen  available on August 1, 2025 for a virtual deposition. I am not available that week because I am deposing multiple disclosed experts that entire week in another case.

In closing, please confirm if you want to select your offered date of August 1, 2025, to depose Mr. Ortega, wherein Attorney Allen is available on that date. I also renew my offered dates of September 10, 12, and 29. As you know, Counsel for Defendant Diaz is available on 09/29/25 for deposition of Diaz which we anticipate to take a half day, so you are welcome to scheduled Mr. Ortega's deposition for that afternoon wherein all counsel for all parties will be present. Of course, attempting to contact Mr. Ortega also affects us answering your request for more information in our disclosures. If we are unable to make contact with Mr. Ortega at all this week, we will inform you on Monday as we attempt to learn what transpired.

Thank you kindly, and have a wonderful day.

UPDATES! [CLICK HERE TO VISIT OUR WEBSITE TO SEE MORE!](#)

(Please include my paralegal Mr. Joseph -- Ajoseph2@rawsi.com -- in all emails. Failure to do so can result in delayed response. "But let justice roll down as waters, and righteousness as a mighty stream." Amos 5:24, ESV. I will Fight until that time remains.)

Rawsi Williams, Esq., R.N.

Attorney | Registered Nurse | Veteran

It's My PURPOSE to Fight for Your Justice. I Am Not Afraid!

TEL: 888-RawsiLaw (888-729-7452)

Rawsi Williams Law Group

701 Brickell Avenue

STE 1550

Miami FL 33131

Email: rawsi@rawsi.com; AJoseph2@rawsi.com

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On Monday, June 23, 2025 at 11:34:00 AM EDT, Llerandi, Jeanette (CAO) <jeanette.llerandi@miamidade.gov> wrote:

Ms. Williams, Good morning,

I just attempted to call your office to follow up on the email below from Ms. Azar. I left a message with the answering service and am also following up with this email.

Is Plaintiff available for deposition on **August 5**? If not, please provide Plaintiff's availability for deposition on any of the following additional dates beginning at 9:30: July 29, 30, 31, & 1.

Thank you in advance,

Jeanette F. Llerandi, Legal Assistant

Miami-Dade County Attorney's Office

111 NW 1st Street – Suite 2810

Miami, FL 33128

Phone: (305) 375-5151

Direct: (305) 375-4933

Attorneys:

Erica S. Zaron, Esq.

Jennifer Azar, Esq.

Sophia Guzzo, Esq.

From: Azar, Jennifer (CAO)

Sent: Wednesday, June 18, 2025 10:08 AM

To: 'Rawsi Williams, ESQ, RN' <rawsi@rawsi.com>; AJoseph2@rawsi.com; docservice@rawsi.com

Cc: trontz@dmtdlaw.com; Llerandi, Jeanette (CAO) <Jeanette.Llerandi@miamidade.gov>; Richardson, LaGarria (CAO) <LaGarria.Richardson@miamidade.gov>

Subject: RE: Ortega: 1) DEPO's of Ortega and Diaz; 2) MEDT: Select Date; 3) SERVICE OF COURT DOCUMENT: ORTEGA, Kenny v. MDC, et al. (24-cv-22523-KMM)

Ms. Williams,

Your confusion is noted. If you ever have any questions, please feel free to call me at (305) 375-4677.

First, regarding your Initial Disclosures, they are deficient as follows: there is no "computation of each category of damages" claimed by your client, or the identifying of any documents supporting such computations, as required by Fed R. Civ. P. 26(a)(1)(A)(iii). For each category of damages you seek—compensatory damages, punitive damages, and any other category of damages you allege—you are required to provide a **computation** of each category of damages and identify the documents supporting such computation. *See* Fed R. Civ. P. 26(a)(1)(A)(iii); *see also De Varona v. Disc. Auto Parts, LLC*, No. 12-20714-CIV, 2012 WL 2334703, at *1 (S.D. Fla. June 19, 2012). Mindful that you served your disclosures almost one week late at this point, please provide the requested information by close of business this **Friday, June 20, 2025**.

Second, you stated you are unavailable August 6—9; I inquired about August 5th through the 9th. Is plaintiff available for deposition on **August 5**? If not, please provide Plaintiff's availability for deposition on any of the following additional dates beginning at 9:30: July 29, 30, 31, & 1. Please provide your response no later than close of business this **Friday, June 20, 2025**.

Thank you,

Jennifer L. Hochstadt Azar

Assistant County Attorney

Miami-Dade County Attorney's Office

111 NW 1st St., Suite 2810

Miami, Florida 33128

(305) 375-5151

From: Rawsi Williams, ESQ, RN <rawsi@rawsi.com>

Sent: Wednesday, June 18, 2025 9:08 AM

To: AJoseph2@rawsi.com; docservice@rawsi.com; Azar, Jennifer (CAO) <jennifer.azar@miamidade.gov>

Cc: trontz@dmrlaw.com; Llerandi, Jeanette (CAO) <jeanette.llerandi@miamidade.gov>; Richardson, LaGarria (CAO) <lagarria.richardson@miamidade.gov>

Subject: Ortega: 1) DEPO's of Ortega and Diaz; 2) MEDT: Select Date; 3) SERVICE OF COURT DOCUMENT: ORTEGA, Kenny v. MDC, et al. (24-cv-22523-KMM)

EMAIL RECEIVED FROM EXTERNAL SOURCE

Good morning,

I hope all is well.

1) **Service of Initial Disclosures by Plaintiff:** Ms. Azar, we are confused as to your email below. There are three separate parties in this case, all represented by separate counsel. No Initial Disclosures have been served by Defendant Diaz, or Plaintiff Mr. Ortega for whom you are already on notice of the technical internet and computer crash last week adversely affecting case documents. Yet, your email below regarding the unserved disclosures was only about/concerning Plaintiff. Seeing that County is attempting to distance itself from the acts of Diaz by having filed a MTD on Plaintiff's *Monell* and *Respondeat Superior* claims, it is more nonsensical that you only sent your email regarding the Magistrate's discovery motions or dispute requirements to Plaintiff. Nonetheless, Plaintiff serves his Initial Disclosures in this email.

Mr. Trontz, Plaintiff is awaiting service of Diaz' Initial Disclosures as well. The Initial Disclosures served by the County are on/in behalf of County only. Plaintiff cannot speak for County regarding the unserved Discovery, but Plaintiff will not file any motion or discovery dispute filings as long as Diaz' Initial Discovery/Rule 26 is served on Plaintiff no later than June 25, 2025.

Court:	Southern District of Florida
Case No.	24-cv-22523-KMM
Initial Parties - Plaintiff(s):	Kenny Ortega
Initial Parties - Defendant(s):	Miami-Dade County Joseph Diaz
Document(s) being served:	Plaintiff's Initial/Rule 26 Disclosures
Sender's name/email:	Rawsi Williams, Esq., R.N. Primary: rawsi@rawsi.com Secondary: AJoseph2@rawsi.com Secondary: docservice@rawsi.com
Sender's phone number:	(888) - RawsiLaw (888-729-7452)

2) **Deposition of Mr. Ortega:** Ms. Azar, neither counsel is available during the requested dates of August 6 - 9, 2025 for a deposition of Mr. Ortega. Please send alternate requested dates. For your convenience, I have provided below to Mr. Trontz dates that I am requesting to depose Defendant Diaz. You are welcomed to use any of the dates below that he does not choose, if so desired.

3) **Deposition of Defendant Diaz:** Mr. Trontz, we need to scheduled deposition of Defendant Joseph Diaz. The deposition can be held virtually. Our available dates are below. Please select a date no later than June 30, 2025.

- September 10, 2025
- September 12, 2025
- September 29, 2025

4) **Finalizing Mediation Dates:** All parties have received the dates sent by Judge Blake's office. Based on our schedules and trial as stated in the email sent to Judge Blake's office, we are choosing dates in November. Can all parties please look at the November 2025 dates offered, and select all dates in which the parties are available. We can then select a mutually available date.

- Plaintiff's available dates: We are available for all offered November dates excluding Veteran's Day, and the week of Thanksgiving ending the following Monday

Thank you kindly, and have a wonderful day.

UPDATES! [CLICK HERE TO VISIT OUR WEBSITE TO SEE MORE!](#)

(Please include my paralegal Mr. Joseph -- AJoseph2@rawsi.com -- in all emails. Failure to do so can result in delayed response. *"But let justice roll down as waters, and righteousness as a mighty stream."* Amos 5:24, ESV. I will Fight until that time remains.)

Rawsi Williams, Esq., R.N.

Attorney | Registered Nurse | Veteran

It's My PURPOSE to Fight for Your Justice. I Am Not Afraid!

TEL: 888-RawsiLaw (888-729-7452)

Rawsi Williams Law Group

701 Brickell Avenue

STE 1550

Miami FL 33131

Email: rawsi@rawsi.com; AJoseph2@rawsi.com

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On Tuesday, June 17, 2025 at 11:25:29 AM EDT, Azar, Jennifer (CAO) <jennifer.azar@miamidade.gov> wrote:

Good Afternoon Ms. Williams & Mr. Allen,

My office has had no response to the request below for Plaintiff's deposition dates, nor have we received Plaintiff's initial disclosures, which were due on Thursday, June 12.

Magistrate Judge Elfenbein requires at least one personal communication for an adequate conference.

I am available from 1pm through 5pm today for a telephone call. Please provide your availability for that timeframe as I will need your position on the status of these outstanding discovery issues promptly.

Thank you,

Jennifer L. Hochstadt Azar

Assistant County Attorney

Miami-Dade County Attorney's Office

111 NW 1st St., Suite 2810

Miami, Florida 33128

(305) 375-5151

From: Richardson, LaGarria (CAO) <Lagarria.Richardson@miamidade.gov>

Sent: Wednesday, June 11, 2025 4:48 PM

To: rawsi@rawsi.com; Ajoseph2@rawsi.com; docservice@rawsi.com

Cc: Azar, Jennifer (CAO) <Jennifer.Azar@miamidade.gov>; Llerandi, Jeanette (CAO) <Jeanette.Llerandi@miamidade.gov>

Subject: SERVICE OF COURT DOCUMENTS: ORTEGA, Kenny v. MDC, et al. (24-cv-22523-KMM)

Good afternoon,

Please find the following attached documents regarding the above-mentioned matter.

We would like to schedule Plaintiff Kenny Ortega's deposition, to be conducted in person, for the first week in August. We are available beginning at 9:30 a.m. on August 5, 6, 7, or 8, 2025. By close of business, Monday, June 16, 2025, please confirm Mr. Ortega's availability as well as your own. Thank you.

Court:	In the United States District Court for the Southern District of Florida
Case No.	24-cv-22523
Plaintiff(s):	Kenny Ortega
Defendant(s):	Miami-Dade County
Title of Document(s):	<ol style="list-style-type: none"> 1. Defendant, Miami-Dade County's Initial Disclosures 2. Defendant, Miami-Dade County's First Request for Production to Plaintiff Kenny Ortega 3. Exhibit A- Facebook Download Instructions 4. Defendant, Miami-Dade County's First Set of Interrogatories to Plaintiff Kenny Ortega
Sender's Name	LaGarria Richardson on behalf of Jennifer Hochstadt, Esq.
Sender's Telephone No.:	(305) 375-5151

LaGarria Richardson, Paralegal

Miami-Dade County Attorney's Office

111 N.W. First Street, Ste. 2810

Miami, FL 33128

Tel.: 305-375-5733

Fax: 305-375-5634